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December 17, 2021

By ECF

The Honorable Paul A. Engelmayer, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Arroyo v. J & M Realty Services Corp., et al.* Case No. 1:21-cv-03611
(PAE)(JLC)

Dear Judge Engelmayer:

This firm represents Defendants J & M Realty Services Corp., Jerry Edelman, David Edelman, and Jessica Edelman, in the above-referenced matter. Plaintiff, Larry Arroyo is represented by the Akin Law Group PLLC, Defendant 291 E. 27th St. Corp., is represented by Riker Danzig Scherer Hyland & Perretti LLP, Defendant 68 Perry Street LLC, is represented by Garibian Law Offices, P.C., and Defendant Bra Real Estate Inc., is represented by Levin-Epstein & Associates, P.C. We write, with the consent of Plaintiff and Defendants, to respectfully request an extension of time to submit the parties' proposed settlement agreement and accompanying memorandum of law for review and approval pursuant to *Cheeks v. Freeport Pancake House, Inc.*, 796 F.3d 199 (2d Cir. 2015).

Subsequent to a mediation session, the parties reached a settlement in principle of all issues in dispute. On November 5, 2021, the Court, having been notified of the parties' settlement, issued an Order dismissing and closing the case. (Dkt. 39). On November 8, 2021, the Court issued an Order reopening the case for review of the proposed settlement agreement pursuant to *Cheeks* and directing the parties to, by November 19, 2021, submit a memorandum of law explaining why the settlement agreement warrants approval pursuant to *Cheeks*. (Dkt. 40). On November 17, 2021, the parties requested an extension of this deadline, and the Court granted the request, directing the parties to, by December 20, 2021, submit a memorandum of law explaining why the settlement agreement warrants approval pursuant to *Cheeks*. (Dkt. 42).

The parties have finalized the settlement agreement, however, it is not expected that all parties will be able to sign the agreement by December 20. Accordingly, we respectfully request

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an extension until December 27, 2021, to submit the proposed settlement agreement and accompanying memorandum of law for the Court's review. This is the second request for an extension of time to submit the parties' proposed settlement agreement, and no other deadlines would be affected by the Court's grant of the requested extension.

We thank the Court for its attention to this matter.

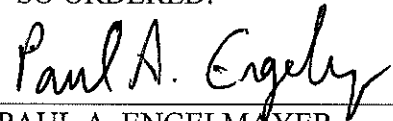
Respectfully submitted,

/s/Benjamin Noren

Benjamin Noren

cc: All Counsel of Record (via ECF)

Granted. SO ORDERED.



PAUL A. ENGELMAYER

United States District Judge

12/17/21